

REVISIONS – 4 OCTOBER 2006

CHANGES TO TENTATIVE WASTE DISCHARGE REQUIREMENTS AND INFORMATION SHEET FOR TIMBER MANAGEMENT SERVICES INC., CLOSURE AND POST CLOSURE MAINTENANCE OF TWIN BRIDGES CLASS II LANDFILL AND CLASS II SURFACE IMPOUNDMENT, Shasta County

WASTE DISCHARGE REQUIREMENTS

Page 2 Revise Finding 9 to read:

Shasta County has issued a permit for the Discharger's parcel describing land use requirements. ~~Condition Finding~~ 39 of Shasta County Use Permit No. 98-20, states, "The discharge of waste, other than primary and secondary sludge from the mill wastewater treatment facility and dregs and grits from the recovery boiler and slaker is prohibited unless specifically authorized by Shasta County Department of Resource Management Environmental Health Division and the Executive Officer of the Regional Water Quality Control Board." The Simpson/Shasta paper mill is closed and mill waste is no longer generated. Cleanup and Abatement Order No. R5-2004-0717 requires Winnemucca Trading Company Limited Inc. (Winnemucca), the current owner of the Simpson/Shasta paper mill, to cleanup sludge from the former wastewater treatment lagoons. Winnemucca is conducting a comprehensive investigation to characterize the volume and quantity of sludge in the lagoons in order to prepare a feasibility study. The investigation results and feasibility study will be submitted to the Regional Water Board by 1 October 2006, and will include options for closing the lagoons. The Discharger has made no arrangements to accept the residual paper sludge waste at the Twin Bridges Class II Landfill.

Page 2 Revise Finding 8 to read:

Cleanup and Abatement Order No. R5-2004-0721 requires the Discharger to establish financial assurance mechanisms for the Twin Bridges Landfill in accordance with provisions of Title 27, California Code of Regulations by 1 April 2005. Regional Water Board staff approved cost estimates of \$72,000 for Corrective Action and \$375,000 for Post Closure Maintenance. ~~On 10 August 2006, the Discharger submitted to Integrated Waste Management Board (IWMB) staff, a draft Letter of Credit for \$375,000 for review and approval. As of 29 August 2006, Regional Water Board staff has not received documentation that the \$72,000 financial mechanism has been submitted to IWMB.~~ On 4 October 2006,

IWMB staff approved a Letter of Credit for \$375,000 and \$72,000. The Discharger has complied with the requirements of CAO No. R5-2004-0721; therefore, Regional Water Board staff rescinded the CAO.

Page 2 & 3 Revise Finding 10 to read:

Shasta County Environmental Health Division received a letter on 8 June 2005 from the Discharger that states, "TMS at this time does not intend to import any fill into the Twin Bridges Landfill under the current permit." The Discharger's Solid Waste Facility Permit, issued by Shasta County, has been inactive since ~~June~~ March 2005. In a 10 July 2006 letter, Shasta County requested the Discharger submit, pursuant to Title ~~27~~ 44, Section ~~21~~ 1110 of the California Code of Regulations, documentation that the landfill is likely to receive additional mill waste. The Discharger has responded to Shasta County and requested a two-year permit extension to remain inactive. Shasta County has not granted the Discharger's request due to lack of a documented waste stream consistent with Use Permit 98-20. In addition, Regional Water Board staff has not received documentation from the Discharger that a viable waste stream exists and is intended for disposal at the Facility. Therefore, in accordance with Section 21110 of Title 27, California Code of Regulations, the Facility must be closed.

Page 13 Revise the Table in Finding 10 to read:

<u>Task</u>	<u>Compliance Date</u>
Final Closure and Post Closure Maintenance Plan Includes plans to close WMU No. 1 Phase 2 and maintain WMU No. 1 Phase 1, WMU No. 2, and the storm water pond	31 December 2006
Submit Proof of Financial Assurances for Closure and Corrective Action	31 December 2006

INFORMATION SHEET

Page 2 Revise the second sentence in the second to last paragraph to read:

~~Finding-Condition~~ 39 of Shasta County Use Permit No. 98-20, states, "The discharge of waste, other than primary and secondary sludge from the mill wastewater treatment facility and dregs and grits from the recovery boiler and slaker is prohibited unless specifically authorized by Shasta County Department of Resource Management Environmental Health Division and the Executive Officer of the Regional Water Quality Control Board."